

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: **BELLSOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO LONG
DISTANCE SERVICE IN TENNESSEE PURSUANT TO SECTION 271 OF
THE TELECOMMUNICATIONS ACT OF 1996**

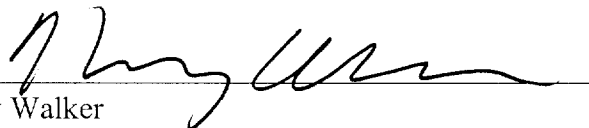
DOCKET NO. 97-00309

**JOINT MOTION TO QUASH AND FOR A PROTECTIVE ORDER,
OR, IN THE ALTERNATIVE, MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE CONSUMER ADVOCATE'S
FIRST DISCOVERY REQUEST**

Intelcom Group, NEXTLINK Tennessee, LLC, Brooks Fiber Communications of Tennessee, Inc., American Communications Services, Inc., and the Southeastern Competitive Carriers Association join in the Joint Motion to Quash filed by Time Warner Communications and LCI International Telecom Corp. in the above captioned proceeding.

In addition, SECCA objects to those questions which are directed at SECCA members. The Association itself is a party to this case, not its individual members. Therefore, SECCA has no obligation to address questions which only SECCA's members can answer.

Respectfully submitted,


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A handwritten signature in cursive script, reading "Dana Shaffer", followed by a horizontal line.

Dana Shaffer
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th of March, 1998, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

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